

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA,

vs.

HARDIK JAYANTILAL PATEL

aka Erik aka Mitesh aka Nick aka Dev and

DHIRENKUMAR VISHNUBHAI PATEL,

Defendants.

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CASE NO. 4:23-cr-218

DEFENDANTS' JOINT UNOPPOSED MOTION TO EXTEND ALL DEADLINES

Defendants Hardik Patel and Dhirenkumar Patel respectfully move that the Court extend the current dates in the Court's scheduling order by 60 days.

On May 17, 2023, a grand jury indicted both defendants for conspiracy to commit mail fraud and wire fraud, mail fraud, and conspiracy to commit money laundering. (Doc. No. 1). Defendants were arrested in Kentucky on August 7, 2023 and subsequently transferred in custody to the Southern District of Texas. (Doc. Nos. 18-19). Further, defendants appeared for their initial appearance and arraignment on August 21, 2023 before Magistrate Judge Ho. The Court set a schedule requiring that pre-trial motions be filed by September 5, 2023, with additional pre-trial and trial deadlines thereafter. (Doc. No. 22).

According to the government, it has assembled and sent discovery materials, which will be received by defendants shortly. The government has represented that the discovery is voluminous. Specifically, the government has indicated that each defendant will receive approximately 1.1 terabytes of data, which includes video files, spreadsheets, text files, Word documents, and PDF files. Because defendants have not yet received discovery, and it appears that once received it will

take some time to review, defendants request a 60 day extension to file pre-trial motions and that all other dates similarly be extended by 60 days.

As stated in the below Certificate of Conference, counsel for the United States has no objection to the requested extension.

WHEREFORE, defendants respectfully request this Court grant their motion for a 60 day extension of all current deadlines.

Respectfully submitted,

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**COUNSEL FOR DEFENDANT
DHIRENKUMAR PATEL**

CERTIFICATE OF CONFERENCE

I certify that undersigned counsel for Defendant Hardik Patel contacted Stephanie Bauman, counsel for the United States, who stated that the United States is unopposed to defendants' motion.

/s/ Steven A. Block

Steven A. Block

CERTIFICATE OF SERVICE

I certify that a true and correct copy of this above and foregoing document was served via ECF on this 1st day of September, 2023.

/s/Francie Trimble

Francie Trimble